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Attorneys for Defendants

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

Eugene Scalia,  
Secretary of Labor,  
United States Department of Labor,

Plaintiff,

vs.

Unforgettable Coatings, Inc., a Nevada  
Corporation; Unforgettable Coatings of Idaho,  
LLC, dba Unforgettable Coatings, a Nevada  
Limited Liability Company; Unforgettable  
Coatings of Arizona, LLC, dba Unforgettable  
Coatings, an Arizona Limited Liability  
Company; Unforgettable Coatings of Utah,  
Inc., dba Unforgettable Coatings, a Utah  
Corporation; Shaun McMurray, an individual;  
Shane Sandall, an individual; Cory  
Summerhayes, an individual

Defendants.

Case No.: 2:20-cv-00510-KJD-BNW

**STIPULATION TO EXTEND DEADLINE  
FOR DEFENDANTS TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

IT IS HEREBY STIPULATED by and between Plaintiff Eugene Scalia, Secretary of Labor, United States Department of Labor ("Plaintiff"), through his counsel, Sonya Shao, and Defendants, Unforgettable Coatings, Inc., Unforgettable Coatings of Idaho, LLC, dba Unforgettable Coatings, Unforgettable Coatings of Arizona, LLC, dba Unforgettable Coatings of Utah, Inc., dba Unforgettable Coatings, Shaun McMurray, Shane Sandall, Cory Summerhayes [sic] ("Defendants"), by and through their counsel, Jackson Lewis

1 P.C., that Defendants shall have an extension up to and including May 1, 2020, in which to file  
2 their respective responses to Plaintiff's Complaint. This Stipulation is submitted and based upon  
3 the following:

4 1. Plaintiff filed his Complaint on March 12, 2020. ECF No. 1. Defendants accepted  
5 service of the Summons and Complaint on March 31, 2020. ECF No. 3.

6 2. Defendants' response to the Complaint is currently due on April 21, 2020.

7 3. Due to the press of other matters, including adjustments made necessary by the  
8 COVID-19 pandemic, and in order to respond to the pleading, counsel for Defendants require  
9 additional time. Counsel for Defendants request an extension, up to and including May 1, 2020,  
10 to file their respective responses to Plaintiff's Complaint.

11 4. This is the first request for an extension of time for Defendants to file a response to  
12 Plaintiff's Complaint.

13 5. This request is made in good faith and not for the purpose of delay.

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6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 21st day of April, 2020

UNITED STATES DEPARTMENT OF  
LABOR

JACKSON LEWIS P.C.

/s/ Sonya Shao  
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/s/ Lynn K. McChrystal  
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Attorneys for Defendants

Attorneys for Plaintiff Eugene Scalia

**ORDER**

IT IS SO ORDERED.

  
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U.S. District/Magistrate Judge

Dated: 4/22/2020

4832-5694-1498, v. 1